

REMARKS

The following issues are outstanding in the present application:

- The title has been objected to
- Claims 1, 17 and 18 have been objected to
- Claims 22 and 23 have been rejected under 35 U.S.C. § 112(2)
- Claims 1-13, 17, 18, 22 and 23 have been rejected under 35 U.S.C. § 103

Applicants hereby traverse all of the rejections and objections and request reconsideration and withdrawal thereof in light of the amendments and remarks contained herein.

Claim Objections

Claims 1, 17 and 18 have been objected to for a minor informality. Applicants have amended the claims which overcomes the examiner's claim objections. Withdrawal of the objection is respectfully requested.

Claim Rejections under 35 U.S.C. § 112

Claims 22 and 23 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. The Examiner asserts that the limitation of "wherein the step of converting..." lacks clear antecedent basis. Applicants point out that claim one recites the step of converting and claims 22 and 23 refer back to that step. Claim 22 adds the limitation of "calculations for converting a source currency into a target currency is automatic." Claim 23 adds the limitation of "mathematical calculations are automatic." Withdrawal of the rejection under 35 U.S.C. § 112 is respectfully requested.

Claim Rejections under 35 U.S.C. § 103

Claims 1-13, 16-18 and 22-23 have been rejected under 35 U.S.C. § 103 in view of Kugimiya et al. (hereinafter Kugimiya) and Maruyama et al (hereinafter Maruyama).

Applicants hereby traverse this rejection. The Office Action states that Kugimiya does not teach the converting at least a portion of the source placeable element into a target placeable element. The Office Action attempts to use Maruyama to show a plurality of translation patterns stored in a memory wherein each translation pattern includes a source pattern, a variable that is identified with a portion of the source language pattern and a target language pattern which is a translation corresponding to the base source language pattern.

To establish a *prima facie* case of obviousness there must be some suggestion or motivation, either in the reference itself or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Claim 1 recites "converting at least a portion of the source placeable element into a target placeable element." Kugimiya does not show converting at least a portion of the source placeable element into a target placeable elements. Maruyama does not show converting at least a portion of the source placeable element into a target placeable elements.

Kugimiya discloses a machine translation apparatus which specifies a part of the source text that is to be entered into the target text without conversion. As shown in Fig. 13, "Non-conversion" text, identified by markers, is inserted into the translated text as it appears in the source text. There is no converting at least a portion of the source placeable element into a target placeable element as recited in claim1. The Kugimiya apparatus provides no meaningful way to change dates, times or measurement from the source language to the target language. The conversion of currency, *e.g.*, dollars to yen, and speed, *e.g.*, miles per hour to kilometers per hour, requires a mathematical conversion, which cannot be gleaned from a dictionary. The Kugimiya system lacks the intellect to accomplish these conversions.

Maruyama discloses a machine translation apparatus which stores a plurality of translation patterns. Each translation pattern includes a source language pattern; a variable that is identified with a portion of the source language pattern; and a target language pattern which is a translation corresponding to the base source language pattern. The variable is either a singular variable which corresponds to a singular source language pattern, or a nested variable which corresponds to a nested source language pattern. Each nested source

language pattern is a combination of two or more singular source language patterns. A portion compares a text sentences to one or more nested source language patterns and singular source language pattern to determine if there is a match between the text sentence and the nested or the singular source language patterns. There is no converting at least a portion of the source placeable element into a target placeable element as recited in claim1. The Maruyama apparatus provides no meaningful way to change dates, times or measurement from the source language to the target language. The conversion of currency, e.g., dollars to yen, and speed, e.g., miles per hour to kilometers per hour, requires a mathematical conversion, which cannot be gleaned from a dictionary.

The combination of Kugimiya and Maruyama is an improper combination of references. The Kugimiya and Maruyama references both lack the method step of converting at least a portion of the source placeable element into a target placeable element as recited in claim1.

Futhermore, Applicants point out that there is no motivation for modifying the Kugimiya apparatus to satisfy the limitations of independent claim 1 and, as such, claim 1 would not have been obvious to those of ordinary skill in the art. In fact the Kugimiya reference teaches away from the claimed invention. The proposed modification would render the Kugimiya invention unsatisfactory for its intended purpose, therefore, there is no suggestion or motivation to make the proposed modification. In addition, the proposed modification or combination of the prior art would change the principle of operation of the Kugimiya invention being modified, therefore, the teachings of the references are not sufficient to render the claims *prima facie* obvious.

Kugimiya provides a machine translation apparatus which specifies by means of markers any desired part of the entered source text for no-conversion, and thereby enables text marked for no-conversion in the source language to be output quickly and correctly in the translated text as it appears in the source text (col. 1., ll.55-60). Kugimiya is trying to reduce the steps or time require to produce a target translation. Attempting to add the missing claim limitation will teach away from the intended invention of Kugimiya.

The differences between what is set forth in claims 2-16, including the limitations of all the claims upon which they depend, are such that they would not have been obvious to those of ordinary skill in the art in view of the cited reference. Withdrawal of the rejection under 35 U.S.C. §103 is respectfully requested.

Claims 17 and 18 recite "a placeable converter." Kugimiya does not show a placeable converter. Kugimiya discloses a machine translation apparatus which specifies a part of the source text that is to be entered into the target text without conversion. As shown in Fig. 13, "Non-conversion" text, identified by markers, is inserted into the translated text as it appears in the source text. There is no placeable converter as recited in claim1. The Kugimiya apparatus provides no meaningful way to change dates, times or measurement from the source language to the target language. The conversion of currency, e.g., dollars to yen, and speed, e.g., miles per hour to kilometers per hour, requires a mathematical conversion, which cannot be gleaned from a dictionary. The Kugimiya system lacks the intellect to accomplish these conversions.

Maruyama discloses a machine translation apparatus which stores a plurality of translation patterns. Each translation pattern includes a source language pattern; a variable that is identified with a portion of the source language pattern; and a target language pattern which is a translation corresponding to the base source language pattern. The variable is either a singular variable which corresponds to a singular source language pattern, or a nested variable which corresponds to a nested source language pattern. Each nested source language pattern is a combination of two or more singular source language patterns. A portion compares a text sentences to one or more nested source language patterns and singular source language pattern to determine if there is a match between the text sentence and the nested or the singular source language patterns. There is no placeable converter as recited in claim1. The Maruyama apparatus provides no meaningful way to change dates, times or measurement from the source language to the target language. The conversion of currency, e.g., dollars to yen, and speed, e.g., miles per hour to kilometers per hour, requires a mathematical conversion, which cannot be gleaned from a dictionary.

rejection. The Office Action states that Motoyama does not teach the converting at least a portion of the source placeable element into a target placeable element. The Office Action attempts to use Maruyama to show a plurality of translation patterns stored in a memory wherein each translation pattern includes a source pattern, a variable that is identified with a portion of the source language pattern and a target language pattern which is a translation corresponding to the base source language pattern.

To establish a *prima facie* case of obviousness there must be some suggestion or motivation, either in the reference itself or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Claim 1 recites "converting at least a portion of the source placeable element into a target placeable element." Motoyama does not show (or even suggest) all of the features recited in claim 1. Motoyama does not show converting at least a portion of the source placeable element into a target placeable elements. Claim 1 defines a system that has the intellect to convert dates, times or measurement from the source language to the target language, *e.g.*, dollars to yen, and speed, *e.g.*, miles per hour to kilometers per hour.

Motoyama utilizes a source-to-target/target-to source dictionary shown in FIG. 4. This dictionary provides no meaningful way to change dates, times or measurement from the source language to the target language. The conversion of currency, *e.g.*, dollar to yen, and speed, *e.g.*, miles per hour to kilometers per hour, requires a mathematical conversion, which cannot be gleaned from a dictionary. The Motoyama system lacks the intellect to accomplish these conversions.

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The combination of Motoyama and Maruyama is an insufficient combination of references. The Motoyama and Maruyama references both lack the method step of converting at least a portion of the source placeable element into a target placeable element as recited in claim1.

The differences between what is set forth in claims 2-16, including the limitations of all the claims upon which they depend, are such that they would not have been obvious to those of ordinary skill in the art in view of the cited reference. Withdrawal of the rejection under 35 U.S.C. §103 is respectfully requested.

Claims 17 and 18 recite "a placeable converter". Motoyama does not show a placeable converter. Claims 17 and 18 define a system that has the intellect to convert dates, times or measurement from the source language to the target language, *e.g.*, dollars to yen, and speed, *e.g.*, miles per hour to kilometers per hour.

Motoyama utilizes a source-to-target/target-to source dictionary shown in FIG. 4. This dictionary provides no meaningful way to change dates, times or measurement from the source language to the target language. The conversion of currency, *e.g.*, dollar to yen, and speed, *e.g.*, miles per hour to kilometers per hour, requires a mathematical conversion, which cannot be gleaned from a dictionary. The Motoyama system lacks the intellect to accomplish these conversions. As stated above, the combination of Motoyama and Maruyama is an insufficient combination of references. The Motoyama and Maruyama references both lack the method step of converting at least a portion of the source placeable element into a target

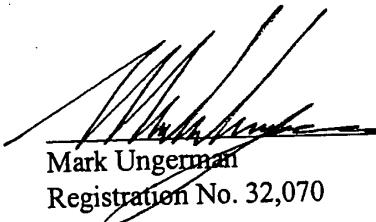
placeable element as recited in claim1. Withdrawal of the rejection under 35 U.S.C. §103 is respectfully requested.

CONCLUSION

The differences between what is set forth in the claims and the prior art are such that they would not have been obvious to those of ordinary skill in the art. This application is in condition for allowance, and early notice of same is earnestly solicited. Should the examiner have any questions, comments or suggestions in furtherance of the prosecution of this application, he is invited to contact Applicants' representative by telephone at the number indicated below.

Respectfully submitted,

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